

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

Carl Jones)	
)	
)	
v.)	Case No.: 3:22-cv-50299
)	Honorable Iain D. Johnston
K.E. Ehrke, et al.,)	
)	
Defendants.)	
)	

AGREED RENEWED MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Plaintiff Carl Jones (“Plaintiff”), by and through his attorneys Justin Weisberg and Jianan Jiang, and Defendants Ehrke, Paul, Abonce, Goodwin, Reinbolz, Parsons, Klienmaier, David Byrd, the City of Dekalb Police Department, and the City of Dekalb, by and through their attorneys IFMK Law, ltd. (collectively, the “Parties”), jointly move this Honorable Court for an extension of deadlines to complete fact discovery.

In support thereof, the Parties state as follows:

1. Fact discovery is set to close in this case on November 12, 2024.
2. The parties have exchanged Rule 26 disclosures and have produced applicable documents.
3. Plaintiff has responded to Defendants’ written discovery requests.
4. Defendants have responded to Plaintiff’s written discovery requests.
5. Defendants plan to depose Plaintiff, Carl Jones.
6. Mr. Jones is transferring from an IDOC facility to DeKalb County Jail.

7. However, Mr. Jones' criminal cases in Dekalb County, 22-CF-287 and 22-CF-288, remain pending. As of November 12, 2024, public defender for Mr. Jones has been appointed.
8. Criminal cases 22-CF-287 and 22-CF-288 arise from, and are related to, the events that occurred on June 3, 2022, which are the subject of Plaintiff's allegations in the present case.
9. Plaintiff believes that it is best that his deposition be postponed until such time that his deposition testimony in this case would not be prejudicial to his ongoing criminal cases (22-CF-287 and 22-CF-288).
10. Plaintiff's counsel is going to confer with Mr. Jones' criminal defense counsel and Mr. Jones regarding the strategy of his civil case.
11. Defendants do not object to an extension of the fact discovery deadline.
12. Accordingly, the parties jointly request that the discovery schedule in this case be extended for a period of two months, up to and including January 12, 2025.

WHEREFORE, the Plaintiff and Defendants jointly request that the fact discovery deadline be extended up to and including January 12, 2025.

Dated: November 12, 2024.

By: /s/ Jianan Jiang

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CERTIFICATE OF SERVICE

I certify that on November 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of said filing to all parties of record.

By: /s/ Jianan Jiang
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